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March 19, 1997

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EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: *In the Matter of Southwestern Bell Telephone Company's Comparably
Efficient Interconnection Plan for the Provision of Basic Payphone
Service, CC Docket No. 96-128*

Dear Mr. Caton:

On March 11, 1997, representatives of Southwestern Bell Telephone Company ("SWBT") met with Commission staff in connection with SWBT's Comparably Efficient Interconnection Plan ("CEI Plan") for Basic Payphone Service. Pursuant to staff's requests, SWBT submits the following information concerning SWBT's compliance with the Commission's orders to update the record in this proceeding.² This letter and the associated filings with the Commission to date demonstrate that SWBT has fulfilled the requirements (assuming effective state and interstate tariffs) contained in the *Payphone Order*, *Payphone Reconsideration Order*, the *Computer Inquiry III* and Open Network Architecture rules.

¹ *Ex Parte* Letter in CC Docket No. 96-128 to William F. Caton, Acting Secretary, FCC from Todd F. Silbergeld, Director-Federal Regulatory, SBC Communications Inc., dated March 11, 1997. SWBT filed the CEI Plan for the provision of Basic Payphone Service on December 30, 1996.

² *See In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Report and Order, FCC 96-388 (released Sept. 20, 1996) (*Payphone Order*); *In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Order on Reconsideration, FCC 96-439 (released Nov. 8, 1996) (*Payphone Reconsideration Order*).

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SWBT COMPLIANCE WITH CEI REQUIREMENTS FOR BASIC PAYPHONE SERVICE

Requirement	Status
Effective interstate CCL tariff reflecting a reduction for deregulated payphone costs and reflecting additional multiline subscriber line revenue	Tariff filed 1/15/97 Effective Date 4/15/97
Effective intrastate tariffs for basic payphone services for "dumb" and "smart" payphones	Tariff filed 1/15/97 Effective Date 4/15/97
Effective intrastate and interstate tariffs for unbundled features associated with the basic payphone services	Tariff filed 1/15/97 Effective Date 4/15/97
Effective cost accounting manual filing	Filed 2/14/97
Deregulate and reclassify, or transfer the value of payphone customer premises equipment and related costs as required in the <i>Report and Order</i>	Contingent Upon CEI Plan Approval Implementation Date 4/1/97
File by 1/15/97 network disclosure regarding interface to SmartCoin SM line	Completed
Identify and report specific accounts, cost pools, and allocators required to capture nonregulated investment and expense by 1/15/97	Completed

The *Payphone Reconsideration Order* required that "any basic payphone network services or unbundled features used by [SWBT's] operations to provide payphone services [] be similarly available to independent payphone providers on a nondiscriminatory, tariffed basis."³ The *Payphone Reconsideration Order* required these basic network services or unbundled features to be tariffed on both the state and federal levels.⁴ SWBT has filed both state and interstate tariffs for these unbundled features. SWBT will offer the following unbundled features apart from the basic "dumb" and "smart" services, and these features have been filed in both state and interstate tariffs: (1) Selective Class of Call Screening ("SCOCS"); (2) Billed Number Screening; (3) International Toll Blocking; and (4) Answer Supervision -- Line Side.⁵

SWBT provides this information in an effort to help the Commission staff as it considers SWBT's CEI Plan. Moreover, by this letter and associated filings,

³ *Payphone Reconsideration Order* at para. 162.

⁴ *Id.*

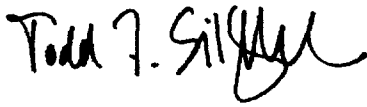
⁵ See *Southwestern Bell Telephone Company Transmittal No. 2608* (dated Jan. 15, 1997); see also *Southwestern Bell Telephone Company Transmittal No. 2614* (dated Feb. 24, 1997).

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SWBT demonstrates its compliance with the *Payphone Order* and *Payphone Reconsideration Order* and, therefore, provided that SWBT's CEI Plan is approved in a timely manner and its tariffs are effective on April 15, 1997, SWBT may begin to receive interim payphone compensation. Expedited consideration of the CEI Plan is essential so that SWBT can begin to receive the interim compensation.

Please direct any inquiries concerning the foregoing to the undersigned.

Very truly yours,

A handwritten signature in black ink, reading "Todd F. Silbergeld". The signature is fluid and cursive, with the first name "Todd" and last name "Silbergeld" clearly legible.

Todd F. Silbergeld
Director - Federal Regulatory

cc: Mr. Metzger
Ms. Richards
Mr. Muleta
Mr. Schlichting
Mr. R. Welch
Ms. Matthey
Ms. A. Stevens
Mr. Carowitz
Ms. M. Carey